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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: September 6, 1994

SUBJECT: Albion-Sheridan Township Landfill Proposed Plan

FROM: Judy Kleiman, RCRA/CERCLA Liaison

TO: Leah Evison, RPM

US EPA RECORDS CENTER REGION 5



471835

The Proposed Plan for the Albion-Sheridan Township Landfill in Albion, Michigan has been reviewed by RCRA for ARARs. This document, as well as other documents previously reviewed, state that several drums at this site contained hazardous waste, but there is no information on whether the waste is listed or is hazardous only by characteristic, and what waste codes would apply. Sludges from electroplating operations were disposed which may have been listed wastes F006 or F008.

For the preferred alternatives, the following RCRA ARARs will be triggered, depending on whether the waste is listed or is hazardous by characteristic. Waste which is neither listed nor characteristic will not trigger RCRA ARARs.

Alternative 2: Removal and Off Site Disposal of Drums

Drums which contain RCRA listed wastes must be treated to meet LDR treatment standards before land disposal and must be disposed of only in a Subtitle C landfill. Drums which contain only characteristic waste must also be treated to meet treatment standards but after treatment may be placed in a Subtitle D landfill. Drums which do not contain either listed or characteristic wastes may still contain high concentrations of hazardous constituents and may pose a risk if allowed to remain in the landfill.

Alternative 3B or 3C: Enhanced Clay Cap or Flexible Membrane Liner Cap

If the electroplating sludges would have met the definition of F006 or F008 then a RCRA cap is an ARAR and the cover should be designed in accordance with EPA guidance Final Covers on Hazardous Waste Landfills and Surface Impoundments, EPA/530-SW-89-047.

If there is no evidence that listed waste has been disposed of here, then either of the caps proposed in Alternatives 3B or 3C would be in compliance with RCRA regulations for covers on solid waste landfills, 40 CFR §258.60.

Alternative 4B: Active collection and flaring of landfill gas

There are no RCRA ARARs for flaring of landfill gas.

Alternative 5A: Ground water monitoring and natural removal of arsenic

For the groundwater, RCRA will be triggered for ground water treatment only if residues are generated by the treatment which are characteristic.

If I can be of further assistance in this matter, please contact me at 6-1482.

cc: Karl Bremer